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May 11, 2017

By ECF

The Honorable Alison J. Nathan
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Anthony Murgio
CR 15-769-AJN

Dear Judge Nathan:

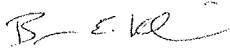
We respectfully request a brief continuance of our client Anthony Murgio's sentencing date from June 16, 2017, to June 27, 2017, with all related briefing dates correspondingly continued. We have conferred with the government about this request, and the government does not oppose it. We have also conferred with Murgio's Probation Officer, Ross Kapitansky about this request. If the requested continuance is granted, he requests that the final PSR due date be correspondingly continued from May 16, 2017, to June 6, 2017.

On January 9, 2017, Murgio pleaded guilty to three counts in superseding indictment filed on December 22, 2016, pursuant to a plea agreement. At that time, the Court set Murgio's sentencing for June 16, 2017, with his sentencing submission due two weeks beforehand (June 2, 2017) and the government's sentencing submission due one week beforehand (June 9, 2017). (See Minute Entry – January 11, 2017.)

There is good cause to grant the requested brief continuance. Since Murgio's guilty plea, we have been actively and diligently working on preparing for his sentencing; however, we need additional time to prepare and finalize his sentencing submission, which is expected to be lengthy and include numerous letters in support of him. Murgio's sentencing is more complex than most due to many factors, including the nature and circumstances of the offenses (e.g., the intersection of Coin.mx and the credit union, HOPE Federal Credit Union) and the multi-week trial of his co-defendants Yuri Lebedev and Trevon Gross (the lengthy transcripts of which require a thorough review and analysis). As a result, it is taking us significant time to put together a sentencing submission for Murgio, and a brief continuance is warranted.

For all the above reasons, we respectfully request the Court continue Murgio's sentencing date from June 16, 2017, to June 27, 2017, with the final PSR due on June 6, 2017, Murgio's sentencing submission due on June 13, 2017, and the government's sentencing submission due on June 20, 2017.

Respectfully submitted,



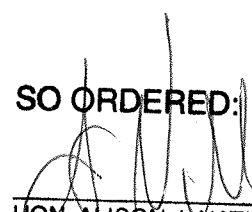
Brian E. Klein
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-and-

Robert A. Soloway
Rothman, Schneider, Soloway & Stein LLP
Attorneys for Anthony Murgio

The sentencing is hereby adjourned to June 27, 2017, at 10:00 a.m. The corresponding extension requests are also granted. SO ORDERED.

SO ORDERED:


HON. ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE

5/12/17

